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March 3, 2014

**BY CERTIFIED MAIL**

Steven R. Belley  
School Street Used Cars and Parts, Inc.  
410 School Street  
Lowell, MA 01851  
Certified # 4011 1150 0000 0300 4728

Ronald E. Belley, President  
School Street Used Cars and Parts, Inc.  
22 Parkhurst Rd.  
Chelmsford, MA 01824  
Certified # 7011 1150 0000 0300 4735

David K. Reppucci, Esq.  
Registered Agent for  
School Street Used Cars and Parts, Inc.  
241 Pawtucket Street  
Lowell, MA 01854  
Certified # 7011 1150 0000 0300 4742

Re: 60-Day Notice of Violations and Intent to File Suit Regarding Noncompliance  
with Federal Clean Water Act's Industrial Stormwater Discharge Requirements:  
410 School Street, Lowell MA

Dear Sirs:

This office represents Clean Water Action, a national non-profit citizens' organization working for prevention of pollution in the nation's waters, protection of natural resources, creation of environmentally-safe jobs and businesses, and empowerment of people to make

90 Canal Street Boston, MA 02114-2022  
617-742-5800 Fax: 617-742-5858 E-Mail: [sswg@sswg.com](mailto:sswg@sswg.com)

democracy work. Clean Water Action has over one million members nationally, more than 50,000 of whom reside in Massachusetts.

School Street Used Cars and Parts, Inc. ("School Street") operates an automobile salvage yard at 410 School Street, Lowell, Massachusetts (the "Facility"). The Facility is failing to comply with the federal Clean Water Act's requirements for control of stormwater pollution. The Facility has been subject to EPA's Multi-Sector General Stormwater Permit for Stormwater Discharges Associated with Industrial Activity ("Stormwater Permit") since at the latest February 2009.<sup>1</sup> Since that date there have been 19 monitoring quarters. In eight of those monitoring quarters the company failed to complete and submit quarterly benchmark monitoring reports. In five of the remaining 11 monitoring quarters, the company found benchmark exceedences for TSS, Aluminum, Iron and/or Lead. On some occasions, these exceedences were many magnitudes above the EPA benchmark limits. In addition, the company did not prepare and submit any annual report during 2009, 2010, 2011 or 2013, as required by the Stormwater Permit. School Street has not implemented sufficient corrective action or taken adequate steps to control pollutants in its stormwater discharges.

We write to give notice that Clean Water Action intends to file a civil action in the United States District Court for the District of Massachusetts under section 505 of the Federal Clean Water Act against School Street for noncompliance with the federal Clean Water Act's stormwater discharge requirements. Stormwater runoff from the Facility is discharged into a Canal leading to the Merrimack River.

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to the weather. As runoff from rain or snowmelt comes into contact with these materials, it picks up pollutants and transports them to nearby rivers, lakes, or coastal waters and tributaries thereto, including but not limited to storm sewer systems, wetlands, and other surface waters. Stormwater pollution is a significant source of water quality problems for the nation's waters.

The following are *some* of the activities, pollutant sources and pollutants that may be present with School Street's automobile salvage yards processes:

Activity	Pollutant Source	Pollutant
Vehicle Dismantling	Oil, anti-freeze, batteries, gasoline, diesel fuel, hydraulic	Oil and grease, ethylene glycol, heavy metals, mercury

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<sup>1</sup> 73 Fed. Reg. 56572 (Sept. 29, 2008). A Notice of Intent to be covered by the Stormwater Permit was filed for the Facility on January 28, 2009.

	fluids, electrical switches	
Used Parts Storage	Batteries, chrome bumpers, wheel balance weights, tires, rims, filters, radiators, catalytic converters, engine blocks, hub caps, doors, drivelines, galvanized metals, mufflers	Sulfuric acid, galvanized metals, oil and grease, heavy metals, petroleum hydrocarbons, total suspended solids (TSS)
Outdoor Vehicle and Equipment Storage	Leaking engines, chipping/corroding bumpers, chipping paint, galvanized metal	Oil and grease, arsenic, organics, heavy metals, total suspended solids (TSS)
Vehicle and Equipment Maintenance	Parts cleaning	Chlorinated solvents, oil and grease, heavy metals, acid/alkaline wastes
	Waste disposal of greasy rags, oil filters, air filters, batteries, hydraulic fluids, transmission fluids, radiator fluids, degreasers	Oil, heavy metals, chlorinated solvents, acid/alkaline wastes oil, heavy metals, chlorinated solvents, acid/alkaline wastes, ethylene glycol
	Spills of oil, degreasers, hydraulic fluids, transmission fluid, and radiator fluids	Oil, arsenic, heavy metals, organics, chlorinated solvents, ethylene glycol
	Fluids replacement, including oil, hydraulic fluids, transmission fluid, and radiator fluids	Oil, arsenic, heavy metals, organics, chlorinated solvents, ethylene glycol
Vehicle, Equipment, and Parts Washing Areas	Washing and steam cleaning waters	Oil and grease, detergents, heavy metals, chlorinated solvents, phosphorus, salts, suspended solids
Liquid Storage in Above Ground Storage Tanks	External corrosion and structural failure, Installation problems, Spills and overfills due to operator error	Fuel, oil and grease, heavy metals, materials being stored

Illicit Connection to Storm Sewer	Sanitary water	Bacteria, biochemical oxygen demand (BOD), suspended solids
	Floor drains	Oil and grease, heavy metals, chlorinated solvents, fuel, ethylene glycol
	Vehicle washwaters	Oil and grease, detergents, metals, chlorinated solvents, phosphorus, suspended solids
	Radiator flushing wastewater	Ethylene glycol
	Leaking underground storage tanks	Materials stored or previously stored

Clean Water Action will ask the Court to ensure School Street's future compliance with the Act, assess civil penalties in an appropriate amount,<sup>2</sup> award plaintiff its litigation costs, including attorney and expert fees, and award any other relief the Court deems appropriate. Clean Water Action's complaint will be filed a minimum of 60 days after the postmark date of this letter. This is a formal 60-day notice of intent to sue that is being served pursuant to 40 C.F.R., Part 135.

This notice is being provided by:

Cindy Luppi, New England Regional Co-Director  
Clean Water Action  
262 Washington Street, Suite 301  
Boston, MA 02108  
(617) 338-8131  
(617) 335-6449 (fax)

Counsel for Clean Water Action in this case is:

Nora J. Chorover  
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<sup>2</sup> The Act authorizes the Court to assess a penalty of up to \$37,500 per day, per violation. *See* 73 Fed. Reg. 75340 (Dec. 11, 2008).

## **SCHOOL STREET'S VIOLATIONS AND DATES OF VIOLATIONS**

School Street's violations are described below and are also set forth on a Table attached as Exhibit A hereto.<sup>3</sup> The Complaint, when filed, will set forth additional days of violations that occur between the date of this letter and the date on which the Complaint is filed.

### **A. VIOLATIONS OF THE TERMS OF THE GENERAL PERMIT**

The company has violated the permit's terms, as follows:

#### **1. Failure to Comply with the Permit's Monitoring Requirements**

School Street is required to monitor its discharges in accordance with the specific provisions of section 6 of the General Permit (pgs. 33-40) and Appendix B, section B. This includes monitoring for benchmark parameters applicable to automobile salvage yards. General Permit, section 8.M.5. School Street was required to monitor for the presence of Total Suspended Solids, Total Aluminum, Total Iron and Total Lead in its stormwater discharges for each quarter commencing with the April 1, 2009 to June 30, 2009 quarter. Quarterly monitoring is required to continue until four consecutive quarterly samples show that pollutants in the company's stormwater discharges are below EPA benchmark levels. School Street failed to comply with these monitoring requirements in eight of the 19 monitoring quarters between since April 2009. *See* Exhibit A.

To the extent additional monitoring violations become known to Clean Water Action before the action is filed, the complaint will seek remedy for such additional monitoring violations. To the extent additional monitoring violations are learned through discovery in the action, the complaint will be amended to seek remedy for such additional monitoring violations.<sup>4</sup>

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<sup>3</sup> Clean Water Action believes that violations have occurred on the dates identified in this letter and on Exhibit A, and not just on rain days. However, to the extent it is determined that rain days are relevant in determining the dates of violations, such rain dates through February 26, 2014 are set forth on Exhibit B hereto. The complaint, when filed, will set forth additional rain dates since February 26, 2014.

<sup>4</sup> Additional discovered monitoring violations may include, without limitation: failure to ensure representative sampling (General Permit, App. B, section B(1)(A), pg. B-5); failure to monitor from all facility outfalls (*id.*, section 6.1.1, pg. 33); failure to monitor during a measurable storm event following the preceding storm by at least 3 days (*id.*, section 6.1.3, pg. 33); failure to conduct monitoring in accordance with test procedures approved under 40 CFR Part 136 (*id.*,

2. Failure to Comply with the Permit's Reporting Requirements.

School Street is required to report certain information to EPA and the Massachusetts Department of Environmental Protection ("Mass DEP") regarding its stormwater discharges in accordance with the provisions of section 7 of the Permit. Among other things, School Street must submit quarterly benchmark monitoring data to EPA. See General Permit, section 7.1.<sup>5</sup> Benchmark monitoring reports were to have been filed with EPA 30 days following receipt of monitoring results. School Street failed to comply with this requirement, as set forth on Exhibit A.

School Street is also required to prepare and submit to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. See General Permit, section 7.2. School Street failed to comply with this requirement during calendar years 2009, 2010, 2011 and 2013, as set forth on Exhibit A.

To the extent additional reporting violations become known to Clean Water Action before the action is filed, the complaint will seek remedy for such additional reporting violations. To the extent additional reporting violations are learned through discovery in the action, the complaint will be amended to seek remedy for such additional reporting violations.<sup>6</sup>

3. Failure to Ensure That Control Measures Minimize Pollutant Discharges

The General Permit requires School Street to ensure that its control measures minimize its stormwater pollutant discharges. General Permit, section 2.0 (pg. 12).<sup>7</sup> The company must modify its control measures as expeditiously as practicable whenever it finds that they "are not achieving their intended effect of minimizing pollutant discharges." *Id.*, section 2.1. School Street's benchmark exceedences demonstrate that the company is not implementing adequate control measures. School Street's most recent monitoring data shows exceedences well above

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App. B, section B(10), pg. B-6); or failure to sample within the first 30 minutes of a measurable storm event (*id.*, section 6.1.4, pg. 34).

<sup>5</sup> If the data contains any exceedences of benchmarks, it must also be submitted to Mass DEP. See General Permit, Section 9.1.2.4.

<sup>6</sup> Additional discovered reporting violations may include, without limitation, failure to submit all reporting data to EPA no later than 30 days after receipt of laboratory results (General Permit, section 7.1).

<sup>7</sup> "Minimize" means "reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice." *Id.*

School Street Used Cars and Parts, Inc.

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the benchmarks for all four parameters.<sup>8</sup> Since the company has not conducted benchmark monitoring since that date it cannot know how its existing control measures are performing and therefore cannot have been modifying them as necessary to minimize stormwater pollutant discharges.

This Notice Letter alleges that School Street failed to implement adequate control measures based on information presently available to Clean Water Action. If additional information regarding this violation becomes known to Clean Water Action in the future, the complaint may set forth some or all of such additional information.

### **CONCLUSION**

Clean Water Action believes this Notice of Violations and Intent to File Suit sufficiently states the basis for a civil action. During the 60-day notice period, we would be willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of litigation. If you wish to pursue such discussions, please have your attorney contact us within the next 20 days so that negotiations may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,



Nora J. Chorover  
Attorney for  
CLEAN WATER ACTION

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<sup>8</sup> The company's December 18, 2012 sample showed TSS at 150 mg/l, Aluminum at 7.2 mg/l, Iron at 7.9 mg/l and lead at .047 mg/l. The immediately preceding sample, taken on August 10, 2012 showed TSS at 400 mg/l, Aluminum at 9.7 mg/l, Iron at 15 mg/l and Lead at .11 mg/l.

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cc: (by certified mail)

Curt Spalding, Regional Administrator  
EPA New England, Region 1,  
5 Post Office Square, Ste. 100  
Boston MA 02109  
Certified Mail # 7011 1150 0000 0300 4759

Gina McCarthy, Administrator  
US EPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Ave., N.W.  
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Certified Mail # 7011 1150 0000 0300 4797

Eric Holder, Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
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Kenneth L. Kimmell, Commissioner  
Massachusetts Department of Environmental Protection  
One Winter Street  
Boston, MA 02108  
Certified Mail # 7011 1150 0000 0300 4780

# **EXHIBIT A**

**SCHOOL STREET USED CARS & PARTS, INC. PERMIT VIOLATIONS**  
**EXHIBIT A**

Quarter	Type of Violation	Parameter	Beginning Date of Violation	Earliest End Date of Violation
1	Failure to Monitor Benchmark	Total Recoverable Lead	June 30, 2009	The present
1	Failure to Report Benchmark	Total Recoverable Lead	July 30, 2009	The present
1	Failure to Monitor Benchmark	Total Recoverable Iron	June 30, 2009	The present
1	Failure to Report Benchmark	Total Recoverable Iron	July 30, 2009	The present
1	Failure to Monitor Benchmark	Total Recoverable Aluminum	June 30, 2009	The present
1	Failure to Report Benchmark	Total Recoverable Aluminum	July 30, 2009	The present
1	Failure to Monitor Benchmark	Total Suspended Solids	June 30, 2009	The present
1	Failure to Report Benchmark	Total Suspended Solids	July 30, 2009	The present
3	Failure to Monitor Benchmark	Total Recoverable Lead	December 31, 2009	The present
3	Failure to Report Benchmark	Total Recoverable Lead	January 30, 2010	The present
3	Failure to Monitor Benchmark	Total Recoverable Iron	December 31, 2009	The present
3	Failure to Report Benchmark	Total Recoverable Iron	January 30, 2010	The present
3	Failure to Monitor Benchmark	Total Recoverable Aluminum	December 31, 2009	The present
3	Failure to Report Benchmark	Total Recoverable Aluminum	January 30, 2010	The present
3	Failure to Monitor Benchmark	Total Suspended Solids	December 31, 2009	The present
3	Failure to Report Benchmark	Total Suspended Solids	January 30, 2010	The present
5	Failure to Monitor Benchmark	Total Recoverable Lead	June 30, 2010	The present
5	Failure to Report Benchmark	Total Recoverable Lead	July 30, 2010	The present
5	Failure to Monitor Benchmark	Total Recoverable Iron	June 30, 2010	The present
5	Failure to Report Benchmark	Total Recoverable Iron	July 30, 2010	The present
5	Failure to Monitor Benchmark	Total Recoverable Aluminum	June 30, 2010	The present
5	Failure to Report Benchmark	Total Recoverable Aluminum	July 30, 2010	The present
5	Failure to Monitor Benchmark	Total Suspended Solids	June 30, 2010	The present
5	Failure to Report Benchmark	Total Suspended Solids	July 30, 2010	The present
10	Failure to Monitor Benchmark	Total Suspended Solids	July 30, 2010	The present
10	Failure to Monitor Benchmark	Total Recoverable Lead	September 30, 2011	The present
10	Failure to Report Benchmark	Total Recoverable Lead	October 30, 2011	The present
10	Failure to Monitor Benchmark	Total Recoverable Iron	September 30, 2011	The present

Quarter	Type of Violation	Parameter	Beginning Date of Violation	Earliest End Date of Violation
10	Failure to Report Benchmark	Total Recoverable Iron	October 30, 2011	The present
10	Failure to Monitor Benchmark	Total Recoverable Aluminum	September 30, 2011	The present
10	Failure to Report Benchmark	Total Recoverable Aluminum	October 30, 2011	The present
10	Failure to Monitor Benchmark	Total Suspended Solids	September 30, 2011	The present
10	Failure to Report Benchmark	Total Suspended Solids	October 30, 2011	The present
11	Failure to Monitor Benchmark	Total Recoverable Lead	December 31, 2011	The present
11	Failure to Report Benchmark	Total Recoverable Lead	January 30, 2012	The present
11	Failure to Monitor Benchmark	Total Recoverable Iron	December 31, 2011	The present
11	Failure to Report Benchmark	Total Recoverable Iron	January 30, 2012	The present
11	Failure to Monitor Benchmark	Total Recoverable Aluminum	December 31, 2011	The present
11	Failure to Report Benchmark	Total Recoverable Aluminum	January 30, 2012	The present
11	Failure to Monitor Benchmark	Total Suspended Solids	December 31, 2011	The present
11	Failure to Report Benchmark	Total Suspended Solids	January 30, 2012	The present
12	Failure to Monitor Benchmark	Total Recoverable Lead	March 31, 2012	The present
12	Failure to Report Benchmark	Total Recoverable Lead	April 30, 2012	The present
12	Failure to Monitor Benchmark	Total Recoverable Iron	March 31, 2012	The present
12	Failure to Report Benchmark	Total Recoverable Iron	April 30, 2012	The present
12	Failure to Monitor Benchmark	Total Recoverable Aluminum	March 31, 2012	The present
12	Failure to Report Benchmark	Total Recoverable Aluminum	April 30, 2012	The present
12	Failure to Monitor Benchmark	Total Suspended Solids	March 31, 2012	The present
12	Failure to Report Benchmark	Total Suspended Solids	April 30, 2012	The present
13	Failure to Monitor Benchmark	Total Recoverable Lead	June 30, 2012	The present
13	Failure to Report Benchmark	Total Recoverable Lead	July 30, 2012	The present
13	Failure to Monitor Benchmark	Total Recoverable Iron	June 30, 2012	The present
13	Failure to Report Benchmark	Total Recoverable Iron	July 30, 2012	The present
13	Failure to Monitor Benchmark	Total Recoverable Aluminum	June 30, 2012	The present
13	Failure to Report Benchmark	Total Recoverable Aluminum	July 30, 2012	The present
13	Failure to Monitor Benchmark	Total Suspended Solids	June 30, 2012	The present
13	Failure to Report Benchmark	Total Suspended Solids	July 30, 2012	The present
17	Failure to Monitor Benchmark	Total Recoverable Lead	June 30, 2013	The present
17	Failure to Report Benchmark	Total Recoverable Lead	July 30, 2013	The present

Quarter	Type of Violation	Parameter	Beginning Date of Violation	Earliest End Date of Violation
17	Failure to Monitor Benchmark	Total Recoverable Iron	June 30, 2013	The present
17	Failure to Report Benchmark	Total Recoverable Iron	July 30, 2013	The present
17	Failure to Monitor Benchmark	Total Recoverable Aluminum	June 30, 2013	The present
17	Failure to Report Benchmark	Total Recoverable Aluminum	July 30, 2013	The present
17	Failure to Monitor Benchmark	Total Suspended Solids	June 30, 2013	The present
17	Failure to Report Benchmark	Total Suspended Solids	July 30, 2013	The present
18	Failure to Monitor Benchmark	Total Recoverable Lead	September 30, 2013	The present
18	Failure to Report Benchmark	Total Recoverable Lead	October 30, 2013	The present
18	Failure to Monitor Benchmark	Total Recoverable Iron	September 30, 2013	The present
18	Failure to Report Benchmark	Total Recoverable Iron	October 30, 2013	The present
18	Failure to Monitor Benchmark	Total Recoverable Aluminum	September 30, 2013	The present
18	Failure to Report Benchmark	Total Recoverable Aluminum	October 30, 2013	The present
18	Failure to Monitor Benchmark	Total Suspended Solids	September 30, 2013	The present
18	Failure to Report Benchmark	Total Suspended Solids	October 30, 2013	The present
Permit Year 1	Failure to Conduct and Document Required Inspections		September 29, 2009	The present
Permit Year 1	Failure to Submit Annual Report		November 13, 2009	The present
Permit Year 2	Failure to Conduct and Document Required Inspections		September 29, 2010	The present
Permit Year 2	Failure to Submit Annual Report		November 13, 2010	The present
Permit Year 3	Failure to Conduct and Document Required Inspections		September 29, 2011	The present
Permit Year 3	Failure to Submit Annual Report		November 13, 2011	The present
Permit Year 5	Failure to Conduct and Document Required Inspections		September 29, 2013	The present
Permit Year 5	Failure to Submit Annual Report		November 13, 2013	The present
Permit Year 5	Failure to Ensure That Control Measures Minimize Pollutant Discharges		October 15, 2009	The present

# **EXHIBIT B**

## **EXHIBIT B**

### **DAYS BETWEEN JUNE 30, 2009 AND FEBRUARY 26, 2014 ON WHICH STORMWATER FROM FACILITY DISCHARGED TO WATERS OF THE UNITED STATES**

June 2009:	30
July 2009:	2, 3, 4, 8, 9, 12, 18, 22, 24, 25, 27, 31
August 2009:	1, 14, 21, 23, 24, 29, 30
September 2009:	12, 13, 27, 28, 29
October 2009:	4, 7, 8, 10, 14, 19, 24, 25, 28, 29
November 2009:	15, 16, 20, 21, 24, 26, 28
December 2009:	1, 3, 4, 9, 10, 14, 21, 27, 28
January 2010:	1, 2, 3, 18, 19, 20, 26
February 2010:	17, 24, 25, 26, 27
March 2010:	1, 12, 14, 15, 16, 23, 24, 26, 27, 29, 30, 31
April 2010:	1, 10, 16, 17, 18, 19, 27, 28, 29
May 2010:	5, 8, 9, 19, 20, 27
June 2010:	2, 7, 10, 11, 13, 23, 25
July 2010:	11, 14, 15, 17, 24
August 2010:	6, 9, 10, 11, 23, 24, 25, 26
September 2010:	9, 14, 17, 27, 28, 29
October 2010:	1, 2, 4, 5, 6, 7, 8, 12, 15, 16, 22, 25, 26, 28
November 2010:	5, 6, 8, 9, 10, 17, 18, 26, 27
December 2010:	1, 2, 13, 23, 27, 28
January 2011:	12, 13, 19, 20, 21, 22, 27, 28
February 2011:	2, 3, 6, 8, 9, 21, 22, 25, 26, 27, 28
March 2011:	1, 7, 11, 12, 17, 22
April 2011:	1, 2, 5, 6, 11, 13, 14, 17, 20, 24, 27, 29
May 2011:	5, 6, 8, 15, 16, 17, 18, 19, 20, 24, 25
June 2011:	2, 10, 12, 13, 14, 23, 24, 25, 26, 29
July 2011:	5, 7, 9, 14, 19, 26, 27
August 2011:	3, 5, 7, 8, 10, 15, 16, 22, 26, 28, 29
September 2011:	6, 7, 8, 9, 16, 21, 22, 23, 24, 29, 30
October 2011:	2, 3, 4, 5, 13, 14, 15, 17, 20, 21, 27, 28, 30
November 2011:	11, 17, 24, 30
December 2011:	8, 16, 22, 23, 28
January 2012:	2, 12, 17, 18, 20, 22, 24, 27, 28
February 2012:	17, 25
March 2012:	1, 2, 3, 14, 26, 29
April 2012:	2, 13, 23, 24
May 2012:	1, 2, 3, 4, 5, 8, 9, 10, 11, 15, 16, 17, 22, 23, 24, 30
June 2012:	3, 4, 5, 6, 7, 9, 13, 14, 24, 26, 28

July 2012:	4, 5, 19, 24, 25, 29, 30
August 2012:	1, 2, 5, 6, 11, 12, 13, 16, 17, 18, 19, 29
September 2012:	5, 6, 9, 19, 27, 28, 29
October 2012:	1, 3, 4, 5, 8, 10, 11, 15, 16, 20, 29, 30, 31
November 2012:	1, 8, 9, 14, 28
December 2012:	3, 8, 9, 10, 11, 17, 18, 19, 21, 22, 27, 28, 30
January 2013:	10, 12, 16, 17, 22, 29, 31
February 2013:	1, 9, 10, 12, 18, 20, 27, 28
March 2013:	7, 8, 9, 13, 19, 20
April 2013:	1, 10, 11, 12, 13, 20, 21, 24
May 2013:	9, 10, 12, 13, 20, 22, 23, 24, 25, 26, 29, 30
June 2013:	3, 4, 8, 11, 12, 14, 18, 19, 25, 26, 27, 28, 29
July 2013:	2, 9, 11, 12, 24, 26, 27, 29, 30
August 2013:	2, 10, 14, 27, 31
September 2013:	3, 11, 13, 14, 22
October 2013:	5, 7, 8, 18, 31
November 2013:	1, 8, 12, 13, 18, 19, 27, 28
December 2013:	2, 7, 9, 10, 11, 15, 18, 24, 27, 30
January 2014:	3, 6, 7, 12, 15, 19, 20, 22
February 2014:	4, 6, 10, 14, 16, 19, 20, 21, 22